



## **Comment-Response Document 2012-18 (B.V(a))**

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### Licensing and medical certification of air traffic controllers (AMC to Part-ATCO, Subpart D, Section 2 (Initial training))

CRD to NPA 2012-18 (B.V(a)) — RMT.0153 (ATM.003(a)) & RMT.0154 (ATM.003(b)) —  
01/10/2013

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## 1. Individual comments and responses

In responding to comments, a standard terminology has been applied to attest the Agency's position. This terminology is as follows:

- (a) **Accepted** — The Agency agrees with the comment and any proposed amendment is wholly transferred to the revised text.
- (b) **Partially accepted** — The Agency either agrees partially with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.
- (c) **Noted** — The Agency acknowledges the comment but no change to the existing text is considered necessary.
- (d) **Not accepted** — The comment or proposed amendment is not shared by the Agency.

### (General Comments)

-

comment

92

comment by: EUROCONTROL

Numbering of all paragraphs in most of the Supplements 1 to AMCs 1 is wrong (only the one for the Basic training and for ADV are correct while all the others are wrong):

AMC1 to Appendix 5 — Aerodrome Control Instrument Rating for Tower ADI (TWR) Supplement 1, pgs. 118-126

AMC1 to Appendix 6 — Approach Control Procedural Rating (APP) - Supplement 1, pgs. 159-167

AMC1 to Appendix 7 — Area Control Procedural Rating (ACP)- Supplement 1, pgs. 198-206

AMC1 to Appendix 8 — Approach Control Surveillance Rating (APS) - Supplement 1, pgs. 243-251

AMC1 to Appendix 9 —Area Control Surveillance Rating (ACS) Supplement 1, pgs. 285-283

response

*Accepted*

The numbering is modified.

comment

95

comment by: Swedish Transport Agency, Civil Aviation Department  
(Transportstyrelsen, Luftfartsavdelningen)

· General on initial training – when the initial training is so detailed in the regulation; does the competent authority have to approve training plans for initial training?

response

*Noted*

According to provisions as in ATCO.AR.A.010(a)(6), the competent authority shall approve training courses, including initial training course.

**NPA 2012-18 (B.V) 'Acceptable Means of Compliance to Part-ATCO, SUBPART D, Section 2 (Initial training)' – General comments**

p. 1-3

comment

1

comment by: ACCCT TF

**ACCCT TF Comments**

It was identified by EUROCONTROL and its stakeholders and recognised by EASA that transposition of "EUROCONTROL Specification for the ATCO CCC Initial Training" into the regulatory system of EASA relies on the training objectives developed in 2006/2007. These objectives could stay in force until 2018/19 and, potentially, some of them may become redundant, ineffective or even unsafe. It was agreed between EASA and EUROCONTROL and approved by ATT to reactivate ATCO CCC Training Task Force to conduct the required revision and update. Although this Task Force, assembled from training experts and regulators from 16 Member States and four international organisations, accomplished the work six months ahead of initial plan it was not possible to include the update in the EASA's NPA published in November 2012. The agreement was to deliver these changes in the form of comments as soon as NPA is published and the following documents have been provided to present the comments on the corresponding AMCs and associated subjects of the EASA NPA 2012-18 (B.V). On behalf of the ACCCT TF all comments are submitted by Vladimir Bubalo, chairman of the TF. They include all changes agreed during the five ACCCT TF meetings conducted between February 14th and November 16th 2012. The rationale for the change is provided below the modified objective and may also include the rationale for modified topics and/or subtopics when appropriate. The first PDF document attached to the first segment (title page) of each AMC of the corresponding Appendix contains **all** objectives with the colour coded track changes for modified parts while all the other documents that are attached to the respective segments (subjects) repeat only the modified parts in the same colour coded format.

To decode the changes the following conventions have been used:

Deleted information is shown with the ~~strikethrough-effect~~

Relocated information is shown with the ~~strikethrough-effect~~

New information is shown in **blue text**.

When an existing objective has been relocated (and consequently renumbered) the new number is shown in black to the left of the objective and the original number in red below the new one.

3.2.1 3.2.1 - current objective number (if not modified it is the same as in NPA 2012-18 (B.V)

3.3.3 3.3.3 - old objective number that may have an additional subject indication if moved from one subject to another or B(asic) and R(ating) if moved from one syllabus to another

1.5.3 1.5.3 - new objective number for relocated objectives at its original location that may have an additional indication of a new subject or B(asic) and R(ating) if moved from one syllabus to another

response

*Accepted*

comment	87	comment by: FABEC
	Attachment <a href="#">#1</a>	
	Please consider the attached FABEC comment with regard to ATCO Initial Training.	
response	<p><i>Partially accepted</i></p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>— Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>— Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subject, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, all the Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.</li> </ul> <p>The Agency fully agrees with the need for the future maintenance of the ATCO Initial Training requirements, as transposed into EU legislation. It is obvious that the Agency itself cannot hold and maintain such detailed knowledge and experience on ATCO training. Therefore, it is foreseen to establish a rulemaking task in which the industry carries the major role in defining and drafting the changes, which are then channelled swiftly to the rulemaking process concerning the Agency measures. The involvement of subject matter experts from affected stakeholders is considered as a very important asset to ensure the future currency of these training requirements, being the key contributing tool to facilitate the recognition of licences. The Agency is committed to ensure that such future activity is undertaken in the most efficient way while only the industry itself can decide how it wishes to organise its resources on the activity. The Agency considers that the list of action verbs is adequate. Some verbs are not used with the existing objectives, but they could be useful to training organisations when developing additional objectives.</p> <p>The Agency has decided to reintroduce the indication of repeated and common objectives aside, according to the convention established in the EUROCONTROL Specification for ATCO CCC Initial Training.</p>	

comment	91	comment by: EUROCONTROL
	Subject 5 (NAVIGATION) is missing in the contents of AMC1 to Appendix 7	
response	<i>Accepted</i>	

The comment refers to the Table of Contents. The text is modified accordingly.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 3 — Basic training**

p. 4-5

comment

11

comment by: ACCCT TF

Attachment [#2](#)

The PDF document (AMC1\_Basic\_TFcomments.pdf) attached here contains **all Basic** objectives where the modified parts are presented in the colour coded track changes format. It is provided to help readers/reviewers in noticing and comparing the proposed changes in the context of all other objectives within the same subtopic/topic or subject. The other documents that are attached to following comments in the respective segments (subjects) repeat only the modified parts in the same colour coded format.

response

*Partially accepted*

The Agency accepts the proposal attached. In response to other subject matter comments received, the Agency, in cooperation with EUROCONTROL and its ACCCT Task Force, introduces changes to the following training objectives:

HUMB 1.3.2

HUMB 3.2.1

HUMB 3.2.2

HUMB 3.4.1

HUMB 3.4.2

LAWB 4.2.1

Modifications are visible with the AMC1 to APPENDIX 3 published with the CRD.

comment

84

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

response

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 – Initial training requirements for Air Traffic Controllers – AMC1 to Appendix 3 – Basic training – Subject 1: INTRODUCTION TO THE COURSE**

p. 6-7

comment 2

comment by: ACCCT TF

response	<p>Attachment <a href="#">#3</a></p> <p>ACCCT TF comments are attached</p> <p>Accepted</p>
comment	<p>84 ❖ <span style="float: right;">comment by: ENAC-FRANCE</span></p> <p><u>Comment:</u> If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u> Transfer subject objectives, topics and sub topic from the IR to the AMC. Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u> B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training</b>. C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u> Add: The subject objective is: Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u> The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>
response	<p>Partially accepted</p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>– Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>– Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.</li> </ul> <p>The results of the review and update of the ATCO Common Core Content for</p>



Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 – Initial training requirements for Air Traffic Controllers – AMC1 to Appendix 3 – Basic training – Subject 2: AVIATION LAW**

p. 8-11

comment

3

comment by: ACCCT TF

Attachment [#4](#)

ACCCT TF comments are attached

response

Accepted

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the

response

potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 3 — Basic training — Subject 3: AIR TRAFFIC MANAGEMENT**

p. 12-17

comment

4

comment by: ACCCT TF

Attachment [#5](#)

ACCCT TF comments are attached

response

*Accepted*

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training

requirements to be proposed with the Opinion and with the successive Agency Decision.

comment	93	comment by: EUROCONTROL
	Subtopic name - editorial correction (this must have been copy/paste error!)	
	Subtopic ATMB 7.1 should be "Vertical separation and procedures" instead of Data extraction	
response	Accepted	
	The text is modified accordingly. New subtopic ATMB 7.1 title is 'Vertical separation and procedures' instead of 'Data extraction'.	

<b>ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 3 — Basic training — Subject 4: METEOROLOGY</b>	p. 18-20
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comment	5	comment by: ACCCT TF
	Attachment <a href="#">#6</a>	
	ACCCT TF comments are attached	
response	Accepted	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u>          If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u>          Transfer subject objectives, topics and sub topic from the IR to the AMC.          Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u>          B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 — Basic training</b>.</p>	

	<p>C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u></p> <p>Add:</p> <p>The subject objective is:</p> <p>Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u></p> <p>The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>
response	<p><i>Partially accepted</i></p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>— Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>— Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.</li> </ul> <p>The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.</p> <p>All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.</p>

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 – Initial training requirements for Air Traffic Controllers – AMC1 to Appendix 3 – Basic training – Subject 5: NAVIGATION** p. 21-23

comment 6

comment by: ACCCT TF

response	<p>Attachment <a href="#">#7</a></p> <p>ACCCT TF comments are attached</p> <p>Accepted</p>
comment	<p>84 ❖ <span style="float: right;">comment by: ENAC-FRANCE</span></p> <p><u>Comment:</u> If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u> Transfer subject objectives, topics and sub topic from the IR to the AMC. Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u> B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training</b>. C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u> Add: The subject objective is: Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u> The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>
response	<p>Partially accepted</p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>– Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>– Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.</li> </ul> <p>The results of the review and update of the ATCO Common Core Content for</p>

Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 – Initial training requirements for Air Traffic Controllers – AMC1 to Appendix 3 – Basic training – Subject 6: AIRCRAFT** p. 24-27

comment 7 comment by: ACCCT TF

Attachment [#8](#)

ACCCT TF comments are attached

response Accepted

comment 84 ❖ comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the

response

potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 3 — Basic training — Subject 7: HUMAN FACTORS**

p. 28-32

comment

8

comment by: ACCCT TF

Attachment [#9](#)

ACCCT TF comments are attached

response

*Partially accepted*

The Agency accepts the proposal attached. In response to other subject matter comments received, the Agency, in cooperation with EUROCONTROL and its



ACCCT Task Force, introduces changes to the following training objectives:

HUMB 1.3.2

HUMB 3.2.1

HUMB 3.2.2

HUMB 3.4.1

HUMB 3.4.2

Modifications are visible with the AMC1 to APPENDIX 3 published with the CRD.

comment

82

comment by: *European HF Advisory group*

Pages 28 – 32, 105-108, 147-150, 188-191, 230-232, 274-277.

Subject 7 Human Factors

The proposed syllabus is old fashioned and generally negative. For instance there no reference to new HF theories relating to:

a) Performance variability and efficiency-thoroughness tradeoff

b) Multitasking

c) Goal conflicts and pressure

d) Decision making

e) Mental skills)

Several models are now so old that it is a shame to see them embedded again (e.g. SHELL, Swiss cheese)

response

*Partially accepted*

The training content proposed for consultation with this NPA is transposed from the EUROCONTROL Specification for the ATCO Common Core Content Initial Training edition 1.0 of 21/10/2008. As described in the Explanatory Note to the NPA, a complete review and update of the Common Core Content has been performed on request by the Agency by EUROCONTROL and its ACCCT Task Force. The resulting amendments proposed by such review and update have been placed by EUROCONTROL as comments to the NPA.

In this context, the subject 'Human Factors' in all Appendices and their related AMCs has been subject to a complete review, to keep it aligned with the progress of Human Factors theories and to establish a subject matter training content appropriate to the context of ATCO Initial Training.

According to this comment, additional modifications to the content proposed by EUROCONTROL and the ACCCT TF are introduced, and the resulting text is available with this CRD.

comment

84 ❖

comment by: *ENAC-FRANCE*

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

response

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

comment

88

comment by: IFATCA

response *Partially accepted*

75	BV	<b>Subject 7 Human Factor</b>	<p>The proposed syllabus is old fashioned and generally negative. For instance there no reference to new HF theories relating to:</p> <ul style="list-style-type: none"> <li>a) Performance variability and efficiency-thoroughness tradeoff</li> <li>b) Multitasking</li> <li>c) Goal conflicts and pressure</li> <li>d) Decision making</li> <li>e) Mental skills)</li> </ul> <p>Several models are now so old that it is a shame to see them embedded again (e.g. SHELL, Swiss cheese) For example Resilience, Safety II etc. are not even mentioned.</p>
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The training content proposed for consultation with this NPA is transposed from the EUROCONTROL Specification for the ATCO Common Core Content Initial Training edition 1.0 of 21/10/2008. As described in the Explanatory Note to the NPA, a complete review and update of the Common Core Content has been performed on request by the Agency by EUROCONTROL and its ACCCT Task Force. The resulting amendments proposed by such review and update have been placed by EUROCONTROL as comments to the NPA.

In this context, the subject 'Human Factors' in all Appendices and their related AMCs has been subject to a complete review, to keep it aligned with the progress of Human Factors theories and to establish a subject matter training content appropriate to the context of ATCO Initial Training.

According to this comment, additional modifications to the content proposed by EUROCONTROL and the ACCCT TF are introduced, and the resulting text is available with this CRD.

comment 89

comment by: IFATCA

76	BV	<b>Subject HUM 10 ACT Safety</b>	<p>It is a bit surprising to find Safety Management under Human Factors.</p> <p>Additionally it seems that this module is looking at towards what goes wrong (investigations). This is now an old concept of safety management. The proactive elements of safety management and the need to identify what is being done right seem to be missing.</p>
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response *Not accepted*

This comment has been misplaced as there is no Subject 'HUM 10 ATC Safety' in Appendix 3 and its related AMCs.

comment 90

comment by: IFATCA

77 BV **Subtopic HUMB  
5.3. Automation**

IFATCA proposes that elements as the IFATCA paper on Automation to ANC 2012 are being part of the syllabus. The current content seems to be a bit outdated.

response *Partially accepted*

The content of the whole subject has been reviewed and updated according to the proposals made by the ACCCT Task Force and other comments. The level of details in the training objectives is considered adequate for the Basic Training.

comment 94

comment by: EUROCONTROL

Objective 1.2.8 - editorial correction – it looks like objective's content was repeated in the corpus (this must have been copy/paste error!)

HUMB 1.2.8 Explain the information requirement of ~~Relevant, timely, accurate~~ ATC. 2 Relevant, timely, accurate

response *Accepted*

The text is modified accordingly. The resulting text of training objective HUMB 1.2.8 is now 'Explain the information requirement of ATC'.

<b>Basic training — Subject 8: EQUIPMENT AND SYSTEMS</b>
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comment	<p>9</p> <p>Attachment <a href="#">#10</a></p> <p>ACCCT TF comments are attached</p>	comment by: ACCCT TF
response	Accepted	

comment	<p>84 ❖</p> <p><u>Comment:</u> If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u> Transfer subject objectives, topics and sub topic from the IR to the AMC. Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u> B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 — Basic training</b>. C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u> Add: The subject objective is: Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u> The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>	comment by: ENAC-FRANCE
response	<p>Partially accepted</p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p>	

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 3 — Basic training — Subject 9: PROFESSIONAL ENVIRONMENT**

p. 37

comment

10

comment by: ACCCT TF

Attachment [#11](#)

ACCCT TF comments are attached

response

*Accepted*

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.  
Add to the AMC each subject objective.

Example for BASIC

response

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

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**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 – Initial training requirements for Air Traffic Controllers – AMC1 to Appendix 3 – Basic training – Supplements**

p. 38-48

comment 86

comment by: ENAC-FRANCE

**Action verbs:**General comment:

Some verbs are listed in NPA tables but not used in the objectives content. Therefore they should not figure in tables and be deleted.

response *Not accepted*

The Agency considers that the list of action verbs is adequate. Some verbs are not used with the existing objectives, but they could be useful to training organisations when developing additional objectives.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 4 — Aerodrome Control Visual Rating (ADV)** p. 49-50

comment 12

comment by: ACCCT TF

Attachment [#12](#)

The PDF document (AMC1\_ADV\_TFcomments.pdf) attached here contains **all ADV** objectives where the modified parts are presented in the colour coded track changes format. It is provided to help readers/reviewers in noticing and comparing the proposed changes in the context of all other objectives within the same subtopic/topic or subject. The other documents that are attached to the following comments in the respective segments (subjects) repeat only the modified parts in the same colour coded format.

response *Partially accepted*

The following modifications to the proposed content are introduced:

Subtopics under topic 'LAW 3 - ATC safety management' are now named 'LAW 3.1 - Feedback process' and 'LAW 3.2 - Safety investigation'.

The essential requirement in Article 4(c)(i) of Annex Vb to the Basic Regulation requires air traffic controllers to be trained in and qualified for abnormal and emergency situations. This is the reason why the term 'abnormal' is used in the subject implementing rule. As regards the original proposal, the Agency considered to be explicit that the rather wide definition proposed for 'abnormal situation' (= circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills) does include unusual and degraded situations as well. The examples placed into the definition itself provided an even more detailed description of abnormal situations, amongst which degraded situations are covered with an example in subparagraph (c).

With the view to clarify further, that the definition for abnormal situation includes unusual and degraded situations, and at the same time maintain consistency with the terminology used in the Basic Regulation, the Agency proposes to expand the definition as follows:



'abnormal situation' means circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills, including degraded situations.

At the same time and following the comments, the examples are placed into AMC material. The training material is also reviewed to ensure the use of consistent terminology.

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for

Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 4 — Aerodrome Control Visual Rating (ADV) — Subject 1: INTRODUCTION TO THE COURSE**

p. 51

comment

13

comment by: ACCCT TF

Attachment [#13](#)

ACCCT TF comments are attached

response

*Accepted*

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.  
Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 — Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will

response

follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
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The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

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**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 – Initial training requirements for Air Traffic Controllers – AMC1 to Appendix 4 – Aerodrome Control Visual Rating (ADV) – Subject 2: AVIATION LAW**

p. 52

comment

14

comment by: ACCCT TF

Attachment [#14](#)

ACCCT TF comments are attached

response

*Partially accepted*

Subtopics under topic 'LAW 3 - ATC safety management' are now named 'LAW

## 3.1 - Feedback process' and 'LAW 3.2 - Safety investigation'.

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.  
Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

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**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 4 — Aerodrome Control Visual Rating (ADV) — Subject 3: AIR TRAFFIC MANAGEMENT**

p. 53-58

comment

15

comment by: ACCCT TF

Attachment [#15](#)

ACCCT TF comments are attached

response

*Accepted*

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 — Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
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The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

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**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 4 — Aerodrome Control Visual Rating (ADV) — Subject 4: METEOROLOGY**

p. 59

comment 16

comment by: ACCCT TF

Attachment [#16](#)

ACCCT TF comments are attached

response *Accepted*

comment 84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in

response

Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 4 — Aerodrome Control Visual Rating (ADV) — Subject 5: NAVIGATION**

p. 60

comment	17	comment by: ACCCT TF
	Attachment <a href="#">#17</a>	
	ACCCT TF comments are attached	
response	Accepted	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u>          If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u>          Transfer subject objectives, topics and sub topic from the IR to the AMC.          Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u>          B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 — Basic training</b>.          C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u>          Add:          The subject objective is:          Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u>          The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>	
response	<p>Partially accepted</p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a</p>	



change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

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**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 – Initial training requirements for Air Traffic Controllers – AMC1 to Appendix 4 – Aerodrome Control Visual Rating (ADV) – Subject 6: AIRCRAFT** p. 61-62

comment	18	comment by: ACCCT TF
	Attachment <a href="#">#18</a>	
	ACCCT TF comments are attached	
response	Accepted	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u> If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u> Transfer subject objectives, topics and sub topic from the IR to the AMC. Add to the AMC each subject objective.</p>	

response

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

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**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 – Initial training requirements for Air Traffic Controllers – AMC1 to Appendix 4 – Aerodrome Control Visual Rating (ADV) – Subject 7: HUMAN FACTORS**

p. 63-66

comment	19	comment by: ACCCT TF
	Attachment <a href="#">#19</a>	
	ACCCT TF comments are attached	
response	<i>Accepted</i>	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u>          If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u>          Transfer subject objectives, topics and sub topic from the IR to the AMC.          Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u>          B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training</b>.          C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u>          Add:          The subject objective is:          Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u>          The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>	
response	<p><i>Partially accepted</i></p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>– Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>– Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its</li> </ul>	

reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

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**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 4 — Aerodrome Control Visual Rating (ADV) — Subject 8: EQUIPMENT AND SYSTEMS**

p. 67-68

comment	20	comment by: ACCCT TF
	Attachment <a href="#">#20</a>	
	ACCCT TF comments are attached	
response	Accepted	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u>          If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u>          Transfer subject objectives, topics and sub topic from the IR to the AMC.          Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u>          B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 — Basic training</b>.          C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u></p>	

	<p>Add:</p> <p>The subject objective is:</p> <p>Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u></p> <p>The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>
response	<p><i>Partially accepted</i></p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>— Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>— Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.</li> </ul> <p>The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.</p> <p>All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.</p>

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 – Initial training requirements for Air Traffic Controllers – AMC1 to Appendix 4 – Aerodrome Control Visual Rating (ADV) – Subject 9: PROFESSIONAL ENVIRONMENT**

p. 69

comment 21

comment by: ACCCT TF

Attachment [#21](#)

ACCCT TF comments are attached

response *Accepted*

comment 84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.  
Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is

explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 4 — Aerodrome Control Visual Rating (ADV) — Subject 10: UNUSUAL/DEGRADED/EMERGENCY SITUATIONS**

p. 70-71

comment	22	comment by: ACCCT TF
	Attachment <a href="#">#22</a>	
	ACCCT TF comments are attached	
response	<p><i>Partially accepted</i></p> <p>The essential requirement in Article 4(c)(i) of Annex Vb to the Basic Regulation requires air traffic controllers to be trained in and qualified for abnormal and emergency situations. This is the reason why the term 'abnormal' is used in the subject implementing rule. As regards the original proposal, the Agency considered to be explicit that the rather wide definition proposed for 'abnormal situation' (= circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills) does include unusual and degraded situations as well. The examples placed into the definition itself provided an even more detailed description of abnormal situations, amongst which degraded situations are covered with an example in subparagraph (c).</p> <p>With the view to clarify further, that the definition for abnormal situation includes unusual and degraded situations, and at the same time maintain consistency with the terminology used in the Basic Regulation, the Agency proposes to expand the definition as follows:</p> <p>'abnormal situation' means circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills, including degraded situations.</p> <p>At the same time and following the comments, the examples are placed into AMC material. The training material is also reviewed to ensure the use of consistent terminology.</p>	

comment	84 ❖	comment by: ENAC-FRANCE
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Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.



<b>ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 4 — Aerodrome Control Visual Rating (ADV) — Subject 11: AERODROMES</b>	p. 72-73
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comment 23 comment by: ACCCT TF

Attachment [#23](#)

ACCCT TF comments are attached

response *Accepted*

comment 84 ❖ comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.  
Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 — Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a

change to the proposed methodology for the transposition, as follows:

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<b>ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 – Initial training requirements for Air Traffic Controllers – AMC1 to Appendix 4 – Aerodrome Control Visual Rating (ADV) – Supplements</b>	p. 74-89
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comment

85

comment by: ENAC-FRANCE

### 3. Common objectives.

#### Comment:

In the present Eurocontrol Common Core Content Document, the repeated and common objectives are referred to with separate titles.

In the AMC, repeated objectives should be identified clearly.

#### Proposal:

#### 3. Repeated and common objectives

a. Repeated and common objectives are only applicable to Rating Training syllabi.

b. Repeated objectives

c. Common objectives

#### **Action verbs:**

#### General comment:

Some verbs are listed in NPA tables but not used in the objectives content. Therefore, they should not figure in the tables and be deleted.

#### f. Action verbs for Level 5:

#### Comment:

Assess, discuss, resolve, theorise and validate are not used in the rating objectives in the NPA. They should be deleted.

#### Proposal: delete these verbs

L5 verb	Definition	Example
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Assess	<del>Estimate value or difficulty, evaluate, appraise</del>	Assess workload
Balance	Weigh (a question, two arguments, etc., against each other)	Balance the workload with the traffic demand.
Discuss	<del>Investigate by reasoning or argument</del>	<del>Discuss the impact of regulation.</del>
Evaluate	Ascertain amount of, find numerical expression for	Evaluate the necessary information to be provided to pilots in need of navigational assistance.
Interpret	To decide on something's meaning or significance when there is a choice	Interpret operational information.
Resolve	<del>Solve, clear up, settle</del>	<del>Resolve conflict</del>
Select	Pick out as best or most suitable	Select the runway in use
Theorise	<del>Extract general principles from a particular experience</del>	<del>Theorise the resolution of conflict between a slow and a fast aircraft</del>
Validate	<del>Make valid, ratify, prove valid, show or confirm the validity of something</del>	<del>Validate one radar vectoring option to expedite the traffic</del>

response *Partially accepted*

The Agency has decided to reintroduce the indication of repeated and common objectives aside, according to the convention established in the EUROCONTROL Specification for ATCO CCC Initial Training.

The Agency considers that the list of action verbs is adequate. Some verbs are not used with the existing objectives, but they could be useful to training organisations when developing additional objectives.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 5 — Aerodrome Control Instrument Rating for Tower ADI (TWR)** p. 90-91

comment 24

comment by: ACCCT TF

Attachment [#24](#)

response

The PDF document (AMC1\_ADI\_TFcomments.pdf) attached here contains **all ADI (TWR)** objectives where the modified parts are presented in the colour coded track changes format. It is provided to help readers/reviewers in noticing and comparing the proposed changes in the context of all other objectives within the same subtopic/topic or subject. The other documents that are attached to the following comments in the respective segments (subjects) repeat only the modified parts in the same colour coded format.

*Partially accepted*

The following modifications to the proposed content are introduced:

Subtopics under topic 'LAW 3 - ATC safety management' are to be named 'LAW 3.1 - Feedback process' and 'LAW 3.2 - Safety investigation'.

Subtopics named 'LAWB 2.3 - Instruments departures and arrivals' is to be modified into 'NAV 2.3 - Instruments departures and arrivals'.

The essential requirement in Article 4(c)(i) of Annex Vb to the Basic Regulation requires air traffic controllers to be trained in and qualified for abnormal and emergency situations. This is the reason why the term 'abnormal' is used in the subject implementing rule. As regards the original proposal, the Agency considered to be explicit that the rather wide definition proposed for 'abnormal situation' (= circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills) does include unusual and degraded situations as well. The examples placed into the definition itself provided an even more detailed description of abnormal situations, amongst which degraded situations are covered with an example in subparagraph (c).

With the view to clarify further, that the definition for abnormal situation includes unusual and degraded situations, and at the same time maintain consistency with the terminology used in the Basic Regulation, the Agency proposes to expand the definition as follows:

'abnormal situation' means circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills, including degraded situations.

At the same time and following the comments, the examples are placed into AMC material. The training material is also reviewed to ensure the use of consistent terminology.

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.  
Add to the AMC each subject objective.

Example for BASIC

response

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

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**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 – Initial training requirements for Air Traffic Controllers – AMC1 to Appendix 5 – Aerodrome Control Instrument Rating for Tower ADI (TWR) – Subject 1: INTRODUCTION TO THE COURSE**

p. 92

comment	25	comment by: ACCCT TF
	Attachment <a href="#">#25</a>	
	ACCCT TF comments are attached	
response	<i>Accepted</i>	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u>          If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u>          Transfer subject objectives, topics and sub topic from the IR to the AMC. Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u>          B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training</b>.</p> <p>C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u>          Add:          The subject objective is:          Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u>          The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>	
response	<p><i>Partially accepted</i></p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>– Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>– Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its</li> </ul>	

reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 5 — Aerodrome Control Instrument Rating for Tower ADI (TWR) — Subject 2: AVIATION LAW**

p. 93

comment	26	comment by: ACCCT TF
	Attachment <a href="#">#26</a>	
	ACCCT TF comments are attached	
response	<i>Partially accepted</i>	
	Subtopics under topic 'LAW 3 - ATC safety management' are to be named 'LAW 3.1 - Feedback process' and 'LAW 3.2 - Safety investigation'.	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u>          If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u>          Transfer subject objectives, topics and sub topic from the IR to the AMC.          Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u>          B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 — Basic training</b>.</p>	

	<p>C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u></p> <p>Add:</p> <p>The subject objective is:</p> <p>Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u></p> <p>The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>
response	<p><i>Partially accepted</i></p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>– Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>– Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.</li> </ul> <p>The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.</p> <p>All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.</p>

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 – Initial training requirements for Air Traffic Controllers – AMC1 to Appendix 5 – Aerodrome Control Instrument Rating for Tower ADI (TWR) – Subject 3: AIR TRAFFIC MANAGEMENT**

p. 94-100

comment 27

comment by: ACCCT TF



response	<p>Attachment <a href="#">#27</a></p> <p>ACCCT TF comments are attached</p> <p>Accepted</p>
comment	<p>84 ❖ <span style="float: right;">comment by: ENAC-FRANCE</span></p> <p><u>Comment:</u> If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u> Transfer subject objectives, topics and sub topic from the IR to the AMC. Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u> B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training</b>. C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u> Add: The subject objective is: Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u> The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>
response	<p>Partially accepted</p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>– Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>– Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.</li> </ul> <p>The results of the review and update of the ATCO Common Core Content for</p>

Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 5 — Aerodrome Control Instrument Rating for Tower ADI (TWR) — Subject 4: METEOROLOGY**

p. 101

comment

28

comment by: ACCCT TF

Attachment [#28](#)

ACCCT TF comments are attached

response

*Accepted*

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 — Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

**The subject objective is:**

response

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and sub-topics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 5 — Aerodrome Control Instrument Rating for Tower ADI (TWR) — Subject 5: NAVIGATION**

p. 102

comment

29

comment by: ACCCT TF

Attachment [#29](#)

ACCCT TF comments are attached

response

*Partially accepted*

Subtopics named 'LAWB 2.3 - Instruments departures and arrivals' is to be modified into 'NAV 2.3 - Instruments departures and arrivals'.

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.  
Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subject, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, all the Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The Agency recognises the need for the future maintenance of the ATCO Initial Training requirements both at IR and AMC level, as transposed into EU legislation. This future activity shall be organised and undertaken under the Rulemaking arrangements of the Agency. The involvement of subject matter experts from affected stakeholders is considered as a very important asset to

ensure the future currency of these requirements, being the key contributing tool to facilitate the recognition of licences. The Agency is committed to ensure that such future activity is undertaken in the most efficient way.

The Agency considers that the list of action verbs is adequate. Some verbs are not used with the existing objectives, but they could be useful to training organisations when developing additional objectives.

The Agency has decided to reintroduce the indication of repeated and common objectives aside, according to the convention established in the EUROCONTROL Specification for ATCO CCC Initial Training.

# **ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 –**

## **Initial training requirements for Air Traffic Controllers – AMC1 to**

### **Appendix 5 – Aerodrome Control Instrument Rating for Tower ADI (TWR) p. 103-104**

#### **– Subject 6: AIRCRAFT**

comment

30

comment by: ACCCT TF

Attachment [#30](#)

ACCCT TF comments are attached

response

*Accepted*

comment

84 ❖

comment by: ENAC-FRANCE

#### Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

#### Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

#### Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

#### Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will

response

follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 –**

**Initial training requirements for Air Traffic Controllers – AMC1 to**

**Appendix 5 – Aerodrome Control Instrument Rating for Tower ADI (TWR) p. 105-108**

**– Subject 7: HUMAN FACTORS**

comment

31

comment by: ACCCT TF

Attachment [#31](#)

ACCCT TF comments are attached

response

*Accepted*

comment	<p data-bbox="355 210 395 246">83</p> <p data-bbox="868 210 1444 246">comment by: <i>European HF Advisory group</i></p> <p data-bbox="355 297 1444 521">           Pages 108, 150, 191, 232, 277            Topic HUM 10 ACT Safety Management            It is a bit surprising to find Safety Management under Human Factors.            Additionally it seems that this module is looking at towards what goes wrong (investigations). This is now an old concept of safety management. The proactive elements of safety management and the need to identify what is being done right seem to be missing.         </p>
response	<p data-bbox="355 544 595 577"><i>Partially accepted</i></p> <p data-bbox="355 633 1444 857">           The training content proposed for consultation with this NPA is transposed from the EUROCONTROL Specification for the ATCO Common Core Content Initial Training edition 1.0 of 21/10/2008. As described in the Explanatory Note to the NPA, a complete review and update of the Common Core Content has been performed on request by the Agency by EUROCONTROL and its ACCCT Task Force. The resulting amendments proposed by such review and update have been placed by EUROCONTROL as comments to the NPA.         </p> <p data-bbox="355 880 1444 1003">           In this context, the subject 'Human Factors' in all Appendices and their related AMCs has been subject to a complete review, to keep it aligned with the progress of Human Factors theories and to establish a subject matter training content appropriate to the context of ATCO Initial Training.         </p> <p data-bbox="355 1025 1444 1216">           The entire training content under the topic HUM 10 'ATC safety management' has been reviewed by EUROCONTROL and the ACCCT TF. It is removed from the subject 'Human Factors' and its updated content is placed under the subject 'Aviation law', in all concerned Appendices and their related AMCs. Additional training objectives are introduced in AMC1 to APPENDIX 3 under subtopic LAWB 4.2, in coordination with EUROCONTROL and the ACCCT TF.         </p>
comment	<p data-bbox="355 1317 427 1350">84 ❖</p> <p data-bbox="1059 1317 1444 1350">comment by: <i>ENAC-FRANCE</i></p> <p data-bbox="355 1406 499 1440"><u>Comment:</u></p> <p data-bbox="355 1440 1444 1630">           If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.         </p> <p data-bbox="355 1630 930 1664"><u>Proposal applicable to BASIC and Ratings:</u></p> <p data-bbox="355 1664 1345 1697">Transfer subject objectives, topics and sub topic from the IR to the AMC.</p> <p data-bbox="355 1697 882 1731">Add to the AMC each subject objective.</p> <p data-bbox="355 1731 611 1765"><u>Example for BASIC</u></p> <p data-bbox="355 1765 1444 1865">           B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training.</b> </p> <p data-bbox="355 1865 1444 1921">           C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.         </p> <p data-bbox="355 1921 738 1955"><u>Example for BASIC Subject1</u></p> <p data-bbox="355 1955 419 1989">Add:</p> <p data-bbox="355 1989 691 2022">The subject objective is:</p>

response

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 –**

**Initial training requirements for Air Traffic Controllers – AMC1 to**

**Appendix 5 – Aerodrome Control Instrument Rating for Tower ADI (TWR)**

**– Subject 8: EQUIPMENT AND SYSTEMS**

p. 109-110

comment

32

comment by: ACCCT TF

Attachment [#32](#)

ACCCT TF comments are attached

response

*Accepted*



comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account

these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 5 — Aerodrome Control Instrument Rating for Tower ADI (TWR) — Subject 9: PROFESSIONAL ENVIRONMENT**

p. 111

comment	33	comment by: ACCCT TF
	Attachment <a href="#">#33</a>	
	ACCCT TF comments are attached	
response	Accepted	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u>          If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u>          Transfer subject objectives, topics and sub topic from the IR to the AMC.          Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u>          B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 — Basic training</b>.          C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u>          Add:          The subject objective is:          Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u>          The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>	

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 5 — Aerodrome Control Instrument Rating for Tower ADI (TWR) — Subject 10: UNUSUAL/DEGRADED/EMERGENCY SITUATIONS** p. 112-114

comment

34

comment by: ACCCT TF

Attachment [#34](#)

ACCCT TF comments are attached

response

*Partially accepted*

The essential requirement in Article 4(c)(i) of Annex Vb to the Basic Regulation requires air traffic controllers to be trained in and qualified for abnormal and emergency situations. This is the reason why the term 'abnormal' is used in the subject implementing rule. As regards the original proposal, the Agency considered to be explicit that the rather wide definition proposed for 'abnormal situation' (= circumstances which are neither routinely nor commonly

experienced and for which an air traffic controller has not developed automatic skills) does include unusual and degraded situations as well. The examples placed into the definition itself provided an even more detailed description of abnormal situations, amongst which degraded situations are covered with an example in subparagraph (c).

With the view to clarify further, that the definition for abnormal situation includes unusual and degraded situations, and at the same time maintain consistency with the terminology used in the Basic Regulation, the Agency proposes to expand the definition as follows:

'abnormal situation' means circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills, including degraded situations.

At the same time and following the comments, the examples are placed into AMC material. The training material is also reviewed to ensure the use of consistent terminology.

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a

change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 –  
Initial training requirements for Air Traffic Controllers – AMC1 to  
Appendix 5 – Aerodrome Control Instrument Rating for Tower ADI (TWR) p. 115-116  
– Subject 11: AERODROMES**

comment	35	comment by: ACCCT TF
	Attachment <a href="#">#35</a>	
	ACCCT TF comments are attached	
response	Accepted	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u> If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u> Transfer subject objectives, topics and sub topic from the IR to the AMC.</p>	

response

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 –**

**Initial training requirements for Air Traffic Controllers – AMC1 to**

**Appendix 5 – Aerodrome Control Instrument Rating for Tower ADI (TWR)**

**– Supplements**

p. 117-132

comment 85 ❖

comment by: ENAC-FRANCE

3. Common objectives.

Comment:

In the present Eurocontrol Common Core Content Document, the repeated and common objectives are referred to with separate titles.

In the AMC, repeated objectives should be identified clearly.

Proposal:

3. ~~Repeated and~~ common objectives

a. ~~Repeated and~~ common objectives are only applicable to Rating Training syllabi.

b. ~~Repeated objectives~~

c. ~~Common objectives~~

**Action verbs:**

General comment:

Some verbs are listed in NPA tables but not used in the objectives content. Therefore, they should not figure in the tables and be deleted.

f. Action verbs for Level 5:

Comment:

Assess, discuss, resolve, theorise and validate are not used in the rating objectives in the NPA. They should be deleted.

Proposal: delete these verbs

L5 verb	Definition	Example
Assess	<del>Estimate value or difficulty, evaluate, appraise</del>	<del>Assess workload</del>
Balance	Weigh (a question, two arguments, etc., against each other)	Balance the workload with the traffic demand.
Discuss	<del>Investigate by reasoning or argument</del>	<del>Discuss the impact of regulation.</del>
Evaluate	Ascertain amount of, find numerical expression for	Evaluate the necessary information to be provided to pilots in need of navigational assistance.
Interpret	To decide on something's meaning or significance when there is a choice	Interpret operational information.
Resolve	<del>Solve, clear up, settle</del>	<del>Resolve conflict</del>
Select	Pick out as best or most suitable	Select the runway in use
Theorise	<del>Extract general principles from a particular experience</del>	<del>Theorise the resolution of conflict between a slow and a fast aircraft</del>
Validate	<del>Make valid, ratify, prove valid, show or confirm the validity of something</del>	<del>Validate one radar vectoring option to expedite the traffic</del>

response *Partially accepted*

The Agency has decided to reintroduce the indication of repeated and common objectives, according to the convention established in the EUROCONTROL Specification for ATCO CCC Initial Training.

The Agency considers that the list of action verbs is adequate. Some verbs are not used with the existing objectives, but they could be useful to training organisations when developing additional objectives.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 –  
Initial training requirements for Air Traffic Controllers – AMC1 to  
Appendix 6 – Approach Control Procedural Rating (APP)**

p. 133-134

comment 36

comment by: ACCCT TF

Attachment [#36](#)

The PDF document (AMC1\_APP\_TFcomments.pdf) attached here contains **all APP** objectives where the modified parts are presented in the colour coded track changes format. It is provided to help readers/reviewers in noticing and comparing the proposed changes in the context of all other objectives within the same subtopic/topic or subject. The other documents that are attached to the following comments in the respective segments (subjects) repeat only the modified parts in the same colour coded format.

response *Partially accepted*

The following modifications to the proposed content are introduced:

Subtopics under topic 'LAW 3 - ATC safety management' are to be named 'LAW 3.1 - Feedback process' and 'LAW 3.2 - Safety investigation'.

Subtopics named 'LAWB 2.3 - Instruments departures and arrivals' is to be modified into 'NAV 2.3 - Instruments departures and arrivals'.

The essential requirement in Article 4(c)(i) of Annex Vb to the Basic Regulation requires air traffic controllers to be trained in and qualified for abnormal and emergency situations. This is the reason why the term 'abnormal' is used in the subject implementing rule. As regards the original proposal, the Agency considered to be explicit that the rather wide definition proposed for 'abnormal situation' (= circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills) does include unusual and degraded situations as well. The examples placed into the definition itself provided an even more detailed description of abnormal situations, amongst which degraded situations are covered with an example in subparagraph (c).

With the view to clarify further, that the definition for abnormal situation includes unusual and degraded situations, and at the same time maintain



consistency with the terminology used in the Basic Regulation, the Agency proposes to expand the definition as follows:

'abnormal situation' means circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills, including degraded situations.

At the same time and following the comments, the examples are placed into AMC material. The training material is also reviewed to ensure the use of consistent terminology.

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.  
Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response

Partially accepted

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its

reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 6 — Approach Control Procedural Rating (APP) — Subject 1: INTRODUCTION TO THE COURSE**

p. 135

comment	37	comment by: ACCCT TF
	Attachment <a href="#">#37</a>	
	ACCCT TF comments are attached	
response	Accepted	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u> If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u> Transfer subject objectives, topics and sub topic from the IR to the AMC. Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u> B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 — Basic training</b>. C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u></p>	

response

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
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The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

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**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 6 — Approach Control Procedural Rating (APP) — Subject 2: AVIATION LAW**

p. 136

comment

38

comment by: ACCCT TF

Attachment [#38](#)

ACCCT TF comments are attached

response *Partially accepted*

Subtopics under topic 'LAW 3 - ATC safety management' are to be named 'LAW 3.1 - Feedback process' and 'LAW 3.2 - Safety investigation'.

comment 84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been

placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

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## ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 –

### Initial training requirements for Air Traffic Controllers – AMC1 to

### Appendix 6 – Approach Control Procedural Rating (APP) – Subject 3: AIR

p. 137-142

### TRAFFIC MANAGEMENT

comment

39

comment by: ACCCT TF

Attachment [#39](#)

ACCCT TF comments are attached

response

Accepted

comment

84 ❖

comment by: ENAC-FRANCE

#### Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

#### Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

#### Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

#### Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the

	<p>potential for development of their careers in ATC.</p> <p><u>Training objectives:</u></p> <p>The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>
response	<p><i>Partially accepted</i></p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>— Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>— Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.</li> </ul> <p>The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.</p> <p>All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.</p>

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 6 — Approach Control Procedural Rating (APP) — Subject 4: METEOROLOGY**

p. 143

comment	<p>40</p> <p>comment by: ACCCT TF</p> <p>Attachment <a href="#">#40</a></p> <p>ACCCT TF comments are attached</p>
response	<p><i>Accepted</i></p>

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

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All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency

Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 6 — Approach Control Procedural Rating (APP) — Subject 5: NAVIGATION**

p. 144

comment

41

comment by: ACCCT TF

Attachment [#41](#)

ACCCT TF comments are attached

response

*Partially accepted*

Subtopics named 'LAWB 2.3 - Instruments departures and arrivals' is to be modified into 'NAV 2.3 - Instruments departures and arrivals'.

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 — Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.



response

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

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**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 —  
Initial training requirements for Air Traffic Controllers — AMC1 to  
Appendix 6 — Approach Control Procedural Rating (APP) — Subject 6:  
AIRCRAFT**

p. 145-146

comment

42

comment by: ACCCT TF

Attachment [#42](#)

ACCCT TF comments are attached

response

*Accepted*

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 —  
Initial training requirements for Air Traffic Controllers — AMC1 to  
Appendix 6 — Approach Control Procedural Rating (APP) — Subject 7:  
HUMAN FACTORS**

p. 147-150

comment

43

comment by: ACCCT TF

Attachment [#43](#)

ACCCT TF comments are attached

response

*Accepted*

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 — Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a

change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 –  
Initial training requirements for Air Traffic Controllers – AMC1 to  
Appendix 6 – Approach Control Procedural Rating (APP) – Subject 8:  
EQUIPMENT AND SYSTEMS**

p. 151-152

comment

44

comment by: ACCCT TF

Attachment [#44](#)

ACCCT TF comments are attached

response

*Accepted*

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

response

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 – Initial training requirements for Air Traffic Controllers – AMC1 to Appendix 6 – Approach Control Procedural Rating (APP) – Subject 9: PROFESSIONAL ENVIRONMENT**

p. 153

comment	45	comment by: ACCCT TF
	Attachment <a href="#">#45</a>	
	ACCCT TF comments are attached	
response	<i>Accepted</i>	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u>          If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u>          Transfer subject objectives, topics and sub topic from the IR to the AMC.          Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u>          B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training</b>.          C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u>          Add:          The subject objective is:          Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u>          The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>	
response	<p><i>Partially accepted</i></p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>– Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>– Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its</li> </ul>	

reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 —  
Initial training requirements for Air Traffic Controllers — AMC1 to  
Appendix 6 — Approach Control Procedural Rating (APP) — Subject 10:  
UNUSUAL/DEGRADED/EMERGENCY SITUATIONS**

p. 154-155

comment

46

comment by: ACCCT TF

Attachment [#46](#)

ACCCT TF comments are attached

response

*Partially accepted*

The essential requirement in Article 4(c)(i) of Annex Vb to the Basic Regulation requires air traffic controllers to be trained in and qualified for abnormal and emergency situations. This is the reason why the term 'abnormal' is used in the subject implementing rule. As regards the original proposal, the Agency considered to be explicit that the rather wide definition proposed for 'abnormal situation' (= circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills) does include unusual and degraded situations as well. The examples placed into the definition itself provided an even more detailed description of abnormal situations, amongst which degraded situations are covered with an example in subparagraph (c).

With the view to clarify further, that the definition for abnormal situation includes unusual and degraded situations, and at the same time maintain consistency with the terminology used in the Basic Regulation, the Agency proposes to expand the definition as follows:

'abnormal situation' means circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills, including degraded situations.

At the same time and following the comments, the examples are placed into AMC material. The training material is also reviewed to ensure the use of

consistent terminology.

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.



All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 —  
Initial training requirements for Air Traffic Controllers — AMC1 to  
Appendix 6 — Approach Control Procedural Rating (APP) — Subject 11:  
AERODROMES**

p. 156-157

comment

47

comment by: ACCCT TF

Attachment [#47](#)

ACCCT TF comments are attached

response

Accepted

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 — Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 —  
Initial training requirements for Air Traffic Controllers — AMC1 to  
Appendix 6 — Approach Control Procedural Rating (APP) — Supplements**

p. 158-173

comment 85 ❖

comment by: ENAC-FRANCE

3. Common objectives.

Comment:

In the present Eurocontrol Common Core Content Document, the repeated and common objectives are referred to with separate titles.

In the AMC, repeated objectives should be identified clearly.

Proposal:

3. Repeated and common objectives

a. Repeated and common objectives are only applicable to Rating Training syllabi.

b. Repeated objectives

c. Common objectives

**Action verbs:**

General comment:

Some verbs are listed in NPA tables but not used in the objectives content. Therefore, they should not figure in the tables and be deleted.

f. Action verbs for Level 5:Comment:

Assess, discuss, resolve, theorise and validate are not used in the rating objectives in the NPA. They should be deleted.

Proposal: delete these verbs

L5 verb	Definition	Example
Assess	<del>Estimate value or difficulty, evaluate, appraise</del>	<del>Assess workload</del>
Balance	Weigh (a question, two arguments, etc., against each other)	Balance the workload with the traffic demand.
Discuss	<del>Investigate by reasoning or argument</del>	<del>Discuss the impact of regulation.</del>
Evaluate	Ascertain amount of, find numerical expression for	Evaluate the necessary information to be provided to pilots in need of navigational assistance.
Interpret	To decide on something's meaning or significance when there is a choice	Interpret operational information.
Resolve	<del>Solve, clear up, settle</del>	<del>Resolve conflict</del>
Select	Pick out as best or most suitable	Select the runway in use
Theorise	<del>Extract general principles from a particular experience</del>	<del>Theorise the resolution of conflict between a slow and a fast aircraft</del>
Validate	<del>Make valid, ratify, prove valid, show or confirm the validity of something</del>	<del>Validate one radar vectoring option to expedite the traffic</del>

response *Partially accepted*

The Agency has decided to reintroduce the indication of repeated and common objectives, according to the convention established in the EUROCONTROL Specification for ATCO CCC Initial Training.

The Agency considers that the list of action verbs is adequate. Some verbs are not used with the existing objectives, but they could be useful to training organisations when developing additional objectives.

comment

48

comment by: ACCCT TF

Attachment [#48](#)

The PDF document (AMC1\_ACP\_TFcomments.pdf) attached here contains **all ACP** objectives where the modified parts are presented in the colour coded track changes format. It is provided to help readers/reviewers in noticing and comparing the proposed changes in the context of all other objectives within the same subtopic/topic or subject. The other documents that are attached to the following comments in the respective segments (subjects) repeat only the modified parts in the same colour coded format.

response

*Partially accepted*

The following modifications to the proposed content are introduced:

Subtopics under topic 'LAW 3 - ATC safety management' are to be named 'LAW 3.1 - Feedback process' and 'LAW 3.2 - Safety investigation'.

The essential requirement in Article 4(c)(i) of Annex Vb to the Basic Regulation requires air traffic controllers to be trained in and qualified for abnormal and emergency situations. This is the reason why the term 'abnormal' is used in the subject implementing rule. As regards the original proposal, the Agency considered to be explicit that the rather wide definition proposed for 'abnormal situation' (= circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills) does include unusual and degraded situations as well. The examples placed into the definition itself provided an even more detailed description of abnormal situations, amongst which degraded situations are covered with an example in subparagraph (c).

With the view to clarify further, that the definition for abnormal situation includes unusual and degraded situations, and at the same time maintain consistency with the terminology used in the Basic Regulation, the Agency proposes to expand the definition as follows:

'abnormal situation' means circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills, including degraded situations.

At the same time and following the comments, the examples are placed into AMC material. The training material is also reviewed to ensure the use of consistent terminology.

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

response

Transfer subject objectives, topics and sub topic from the IR to the AMC.  
Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive AgencyEASA Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 – Initial training requirements for Air Traffic Controllers – AMC1 to Appendix 7 – Area Control Procedural Rating (ACP) – Subject 1: INTRODUCTION TO THE COURSE**

p. 176

comment	49	comment by: ACCCT TF
	Attachment <a href="#">#49</a>	
	ACCCT TF comments are attached	
response	<i>Accepted</i>	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u>          If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u>          Transfer subject objectives, topics and sub topic from the IR to the AMC. Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u>          B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training</b>.</p> <p>C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u>          Add:          The subject objective is:          Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u>          The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>	
response	<p><i>Partially accepted</i></p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>– Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>– Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its</li> </ul>	

reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 7 — Area Control Procedural Rating (ACP) — Subject 2: AVIATION LAW**

p. 177

comment

50

comment by: ACCCT TF

Attachment [#50](#)

ACCCT TF comments are attached

response

*Partially accepted*

Subtopics under topic 'LAW 3 - ATC safety management' are to be named 'LAW 3.1 - Feedback process' and 'LAW 3.2 - Safety investigation'.

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 — Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC

	<p>for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u></p> <p>Add:</p> <p>The subject objective is:</p> <p>Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u></p> <p>The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>
response	<p><i>Partially accepted</i></p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>– Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>– Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.</li> </ul> <p>The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.</p> <p>All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.</p>

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 –  
Initial training requirements for Air Traffic Controllers – AMC1 to  
Appendix 7 – Area Control Procedural Rating (ACP) – Subject 3: AIR  
TRAFFIC MANAGEMENT**

p. 178-183

comment 51

comment by: ACCCT TF

Attachment [#51](#)



response	<p>ACCCT TF comments are attached</p> <p><i>Accepted</i></p>
comment	<p>84 ❖ <span style="float: right;">comment by: ENAC-FRANCE</span></p> <p><u>Comment:</u>          If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u>          Transfer subject objectives, topics and sub topic from the IR to the AMC.          Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u>          B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training</b>.          C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u>          Add:          The subject objective is:          Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u>          The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>
response	<p><i>Partially accepted</i></p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>– Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>– Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.</li> </ul> <p>The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to</p>

place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 7 — Area Control Procedural Rating (ACP) — Subject 4: METEOROLOGY**

p. 184

comment	52	comment by: ACCCT TF
	Attachment <a href="#">#52</a>	
	ACCCT TF comments are attached	
response	Accepted	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u> If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u> Transfer subject objectives, topics and sub topic from the IR to the AMC. Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u> B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 — Basic training</b>. C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u> Add: The subject objective is: Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u></p>	

response

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 7 — Area Control Procedural Rating (ACP) — Subject 5: NAVIGATION**

p. 185

comment

53

comment by: ACCCT TF

Attachment [#53](#)

ACCCT TF comments are attached

response

*Accepted*

comment

84 ❖

comment by: ENAC-FRANCE

	<p><u>Comment:</u> If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u> Transfer subject objectives, topics and sub topic from the IR to the AMC. Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u> B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training</b>. C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u> Add: The subject objective is: Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u> The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>
response	<p><i>Partially accepted</i></p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>– Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>– Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.</li> </ul> <p>The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.</p> <p>All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.</p>

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 –  
Initial training requirements for Air Traffic Controllers – AMC1 to  
Appendix 7 – Area Control Procedural Rating (ACP) – Subject 6:  
AIRCRAFT**

p. 186-187

comment

54

comment by: ACCCT TF

Attachment [#54](#)

ACCCT TF comments are attached

response

Accepted

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response

Partially accepted

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order

to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 —  
Initial training requirements for Air Traffic Controllers — AMC1 to  
Appendix 7 — Area Control Procedural Rating (ACP) — Subject 7: HUMAN  
FACTORS**

p. 188-191

comment

55

comment by: ACCCT TF

Attachment [#55](#)

ACCCT TF comments are attached

response

Accepted

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be

response

modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 –  
Initial training requirements for Air Traffic Controllers – AMC1 to  
Appendix 7 – Area Control Procedural Rating (ACP) – Subject 8:**

p. 192-193

## EQUIPMENT AND SYSTEMS

comment 56 comment by: ACCCT TF

Attachment [#56](#)

ACCCT TF comments are attached

response *Accepted*

comment 84 ❖ comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:



- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 7 — Area Control Procedural Rating (ACP) — Subject 9: PROFESSIONAL ENVIRONMENT**

p. 194

comment

57

comment by: ACCCT TF

Attachment [#57](#)

ACCCT TF comments are attached

response

*Accepted*

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.  
Add to the AMC each subject objective.

response

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 –  
Initial training requirements for Air Traffic Controllers – AMC1 to  
Appendix 7 – Area Control Procedural Rating (ACP) – Subject 10:  
UNUSUAL/DEGRADED/EMERGENCY SITUATIONS**

p. 195-196

comment	58 <span style="float: right;">comment by: ACCCT TF</span>
	Attachment <a href="#">#58</a>
	ACCCT TF comments are attached
response	<i>Partially accepted</i>
	<p>The essential requirement in Article 4(c)(i) of Annex Vb to the Basic Regulation requires air traffic controllers to be trained in and qualified for abnormal and emergency situations. This is the reason why the term 'abnormal' is used in the subject implementing rule. As regards the original proposal, the Agency considered to be explicit that the rather wide definition proposed for 'abnormal situation' (= circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills) does include unusual and degraded situations as well. The examples placed into the definition itself provided an even more detailed description of abnormal situations, amongst which degraded situations are covered with an example in subparagraph (c).</p> <p>With the view to clarify further, that the definition for abnormal situation includes unusual and degraded situations, and at the same time maintain consistency with the terminology used in the Basic Regulation, the Agency proposes to expand the definition as follows:</p> <p>'abnormal situation' means circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills, including degraded situations.</p> <p>At the same time and following the comments, the examples are placed into AMC material. The training material is also reviewed to ensure the use of consistent terminology.</p>
comment	84 ❖ <span style="float: right;">comment by: ENAC-FRANCE</span>
	<u>Comment:</u>
	If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.
	<u>Proposal applicable to BASIC and Ratings:</u>
	Transfer subject objectives, topics and sub topic from the IR to the AMC.
	Add to the AMC each subject objective.
	<u>Example for BASIC</u>
	B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training</b> .
	C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.
	<u>Example for BASIC Subject1</u>
	Add:
	The subject objective is:
	Learners shall know and understand the training programme that they will

response

follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 —  
Initial training requirements for Air Traffic Controllers — AMC1 to  
Appendix 7 — Area Control Procedural Rating (ACP) — Supplements**

p. 197-212

comment

85 ❖

comment by: ENAC-FRANCE

3. Common objectives.

Comment:

In the present Eurocontrol Common Core Content Document, the repeated and common objectives are referred to with separate titles.

In the AMC, repeated objectives should be identified clearly.

Proposal:

3. Repeated and common objectives

a. Repeated and common objectives are only applicable to Rating Training

syllabi.

b. Repeated objectives

c. Common objectives

**Action verbs:**

General comment:

Some verbs are listed in NPA tables but not used in the objectives content. Therefore, they should not figure in the tables and be deleted.

f. Action verbs for Level 5:

Comment:

Assess, discuss, resolve, theorise and validate are not used in the rating objectives in the NPA. They should be deleted.

Proposal: delete these verbs

L5 verb	Definition	Example
Assess	<del>Estimate value or difficulty, evaluate, appraise</del>	<del>Assess workload</del>
Balance	Weigh (a question, two arguments, etc., against each other)	Balance the workload with the traffic demand.
Discuss	<del>Investigate by reasoning or argument</del>	<del>Discuss the impact of regulation.</del>
Evaluate	Ascertain amount of, find numerical expression for	Evaluate the necessary information to be provided to pilots in need of navigational assistance.
Interpret	To decide on something's meaning or significance when there is a choice	Interpret operational information.
Resolve	<del>Solve, clear up, settle</del>	<del>Resolve conflict</del>
Select	Pick out as best or most suitable	Select the runway in use
Theorise	<del>Extract general principles from a particular experience</del>	<del>Theorise the resolution of conflict between a slow and a fast aircraft</del>
Validate	<del>Make valid, ratify, prove valid, show or confirm the validity of something</del>	<del>Validate one radar vectoring option to expedite the traffic</del>

response *Partially accepted*

The Agency has decided to reintroduce the indication of repeated and common objectives, according to the convention established in the EUROCONTROL Specification for ATCO CCC Initial Training.

The Agency considers that the list of action verbs is adequate. Some verbs are not used with the existing objectives, but they could be useful to training organisations when developing additional objectives.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 —  
Initial training requirements for Air Traffic Controllers — AMC1 to  
Appendix 8 — Approach Control Surveillance Rating (APS)**

p. 213-214

comment

59

comment by: ACCCT TF

Attachment [#59](#)

The PDF document (AMC1\_APS\_TFcomments.pdf) attached here contains **all APS** objectives where the modified parts are presented in the colour coded track changes format. It is provided to help readers/reviewers in noticing and comparing the proposed changes in the context of all other objectives within the same subtopic/topic or subject. The other documents that are attached to the following comments in the respective segments (subjects) repeat only the modified parts in the same colour coded format.

response

*Partially accepted*

The following modifications to the proposed content are introduced:

Subtopics under topic 'LAW 3 - ATC safety management' are to be named 'LAW 3.1 - Feedback process' and 'LAW 3.2 - Safety investigation'.

Subtopics named 'LAWB 2.3 - Instruments departures and arrivals' is to be modified into 'NAV 2.3 - Instruments departures and arrivals'.

The essential requirement in Article 4(c)(i) of Annex Vb to the Basic Regulation requires air traffic controllers to be trained in and qualified for abnormal and emergency situations. This is the reason why the term 'abnormal' is used in the subject implementing rule. As regards the original proposal, the Agency considered to be explicit that the rather wide definition proposed for 'abnormal situation' (= circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills) does include unusual and degraded situations as well. The examples placed into the definition itself provided an even more detailed description of abnormal situations, amongst which degraded situations are covered with an example in subparagraph (c).

With the view to clarify further, that the definition for abnormal situation includes unusual and degraded situations, and at the same time maintain consistency with the terminology used in the Basic Regulation, the Agency proposes to expand the definition as follows:

'abnormal situation' means circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills, including degraded situations.

At the same time and following the comments, the examples are placed into AMC material. The training material is also reviewed to ensure the use of consistent terminology.

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training

requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 8 — Approach Control Surveillance Rating (APS) — Subject 1: INTRODUCTION TO THE COURSE**

p. 215

comment 60 comment by: ACCCT TF

Attachment [#60](#)

ACCCT TF comments are attached

response Accepted

comment 84 ❖ comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.  
Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 — Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response Partially accepted



The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 8 — Approach Control Surveillance Rating (APS) — Subject 2: AVIATION LAW**

p. 216

comment

61

comment by: ACCCT TF

Attachment [#61](#)

ACCCT TF comments are attached

response

*Partially accepted*

Subtopics under topic 'LAW 3 - ATC safety management' are to be named 'LAW 3.1 - Feedback process' and 'LAW 3.2 - Safety investigation'.

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

response

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 –  
Initial training requirements for Air Traffic Controllers – AMC1 to  
Appendix 8 – Approach Control Surveillance Rating (APS) – Subject 3:  
AIR TRAFFIC MANAGEMENT**

p. 217-225

comment	62	comment by: ACCCT TF
	Attachment <a href="#">#62</a>	
	ACCCT TF comments are attached	
response	Accepted	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u> If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u> Transfer subject objectives, topics and sub topic from the IR to the AMC. Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u> B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training</b>. C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u> Add: The subject objective is: Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u> The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>	
response	<p>Partially accepted</p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a</p>	

change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 – Initial training requirements for Air Traffic Controllers – AMC1 to Appendix 8 – Approach Control Surveillance Rating (APS) – Subject 4: METEOROLOGY**

p. 226

comment	63	comment by: ACCCT TF
	Attachment <a href="#">#63</a>	
	ACCCT TF comments are attached	
response	Accepted	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u>          If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u>          Transfer subject objectives, topics and sub topic from the IR to the AMC.</p>	

response

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 – Initial training requirements for Air Traffic Controllers – AMC1 to Appendix 8 – Approach Control Surveillance Rating (APS) – Subject 5: NAVIGATION**

p. 227

comment	64	comment by: ACCCT TF
	Attachment <a href="#">#64</a>	
	ACCCT TF comments are attached	
response	<i>Partially accepted</i>	
	Subtopics named 'LAWB 2.3 - Instruments departures and arrivals' is to be modified into 'NAV 2.3 - Instruments departures and arrivals'.	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u> If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u> Transfer subject objectives, topics and sub topic from the IR to the AMC. Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u> B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training</b>. C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u> Add: The subject objective is: Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u> The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>	
response	<i>Partially accepted</i>	
	<p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>– Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>– Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the</li> </ul>	

subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 —  
Initial training requirements for Air Traffic Controllers — AMC1 to  
Appendix 8 — Approach Control Surveillance Rating (APS) — Subject 6:  
AIRCRAFT**

p. 228-229

comment

65

comment by: ACCCT TF

Attachment [#65](#)

ACCCT TF comments are attached

response

*Accepted*

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.  
Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and sub topics~~ contained in **Appendix 3 — Basic training**.

	<p>C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u></p> <p>Add:</p> <p>The subject objective is:</p> <p>Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u></p> <p>The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>
response	<p><i>Partially accepted</i></p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>— Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>— Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.</li> </ul> <p>The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.</p> <p>All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.</p>

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 —  
Initial training requirements for Air Traffic Controllers — AMC1 to  
Appendix 8 — Approach Control Surveillance Rating (APS) — Subject 7:  
HUMAN FACTORS**

p. 230-233

comment 66

comment by: ACCCT TF



response	<p>Attachment <a href="#">#66</a></p> <p>ACCCT TF comments are attached</p> <p>Accepted</p>
comment	<p>84 ❖ <span style="float: right;">comment by: ENAC-FRANCE</span></p> <p><u>Comment:</u> If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u> Transfer subject objectives, topics and sub topic from the IR to the AMC. Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u> B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training</b>. C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u> Add: The subject objective is: Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u> The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>
response	<p>Partially accepted</p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>— Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>— Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.</li> </ul> <p>The results of the review and update of the ATCO Common Core Content for</p>

Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

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**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 –  
Initial training requirements for Air Traffic Controllers – AMC1 to  
Appendix 8 – Approach Control Surveillance Rating (APS) – Subject 8:  
EQUIPMENT AND SYSTEMS**

p. 234-236

comment

67

comment by: ACCCT TF

Attachment [#67](#)

ACCCT TF comments are attached

response

*Accepted*

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

**The subject objective is:**

response

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 8 — Approach Control Surveillance Rating (APS) — Subject 9: PROFESSIONAL ENVIRONMENT**

p. 237

comment

68

comment by: ACCCT TF

Attachment [#68](#)

ACCCT TF comments are attached

response *Accepted*

comment 84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is

explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 –  
Initial training requirements for Air Traffic Controllers – AMC1 to  
Appendix 8 – Approach Control Surveillance Rating (APS) – Subject 10:  
UNUSUAL/DEGRADED/EMERGENCY SITUATIONS**

p. 238-239

comment

69

comment by: ACCCT TF

Attachment [#69](#)

ACCCT TF comments are attached

response

*Partially accepted*

The essential requirement in Article 4(c)(i) of Annex Vb to the Basic Regulation requires air traffic controllers to be trained in and qualified for abnormal and emergency situations. This is the reason why the term 'abnormal' is used in the subject implementing rule. As regards the original proposal, the Agency considered to be explicit that the rather wide definition proposed for 'abnormal situation' (= circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills) does include unusual and degraded situations as well. The examples placed into the definition itself provided an even more detailed description of abnormal situations, amongst which degraded situations are covered with an example in subparagraph (c).

With the view to clarify further, that the definition for abnormal situation includes unusual and degraded situations, and at the same time maintain consistency with the terminology used in the Basic Regulation, the Agency proposes to expand the definition as follows:

'abnormal situation' means circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills, including degraded situations.

At the same time and following the comments, the examples are placed into AMC material. The training material is also reviewed to ensure the use of consistent terminology.

comment

84 ❖

comment by: ENAC-FRANCE

response

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 –  
Initial training requirements for Air Traffic Controllers – AMC1 to  
Appendix 8 – Approach Control Surveillance Rating (APS) – Subject 11:  
AERODROMES** p. 240-241

comment	70	comment by: ACCCT TF
	Attachment <a href="#">#70</a>	
	ACCCT TF comments are attached	
response	Accepted	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u> If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u> Transfer subject objectives, topics and sub topic from the IR to the AMC. Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u> B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training</b>. C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u> Add: The subject objective is: Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u> The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>	
response	<p>Partially accepted</p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order</p>	

to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

## **ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 —**

### **Initial training requirements for Air Traffic Controllers — AMC1 to**

p. 242-257

### **Appendix 8 — Approach Control Surveillance Rating (APS) — Supplements**

comment 85 ❖

comment by: ENAC-FRANCE

#### 3. Common objectives.

##### Comment:

In the present Eurocontrol Common Core Content Document, the repeated and common objectives are referred to with separate titles.

In the AMC, repeated objectives should be identified clearly.

##### Proposal:

#### 3. Repeated and common objectives

a. Repeated and common objectives are only applicable to Rating Training syllabi.

b. Repeated objectives

c. Common objectives

##### **Action verbs:**

##### General comment:

Some verbs are listed in NPA tables but not used in the objectives content. Therefore, they should not figure in the tables and be deleted.

##### f. Action verbs for Level 5:

##### Comment:

Assess, discuss, resolve, theorise and validate are not used in the rating objectives in the NPA. They should be deleted.



Proposal: delete these verbs

L5 verb	Definition	Example
Assess	<del>Estimate value or difficulty, evaluate, appraise</del>	<del>Assess workload</del>
Balance	Weigh (a question, two arguments, etc., against each other)	Balance the workload with the traffic demand.
Discuss	<del>Investigate by reasoning or argument</del>	<del>Discuss the impact of regulation.</del>
Evaluate	Ascertain amount of, find numerical expression for	Evaluate the necessary information to be provided to pilots in need of navigational assistance.
Interpret	To decide on something's meaning or significance when there is a choice	Interpret operational information.
Resolve	<del>Solve, clear up, settle</del>	<del>Resolve conflict</del>
Select	Pick out as best or most suitable	Select the runway in use
Theorise	<del>Extract general principles from a particular experience</del>	<del>Theorise the resolution of conflict between a slow and a fast aircraft</del>
Validate	<del>Make valid, ratify, prove valid, show or confirm the validity of something</del>	<del>Validate one radar vectoring option to expedite the traffic</del>

response *Partially accepted*

The Agency has decided to reintroduce the indication of repeated and common objectives, according to the convention established in the EUROCONTROL Specification for ATCO CCC Initial Training.

The Agency considers that the list of action verbs is adequate. Some verbs are not used with the existing objectives, but they could be useful to training organisations when developing additional objectives.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 —  
Initial training requirements for Air Traffic Controllers — AMC1 to  
Appendix 9 — Area Control Surveillance Rating (ACS)**

p. 258-259

comment 71

comment by: ACCCT TF

	<p>Attachment <a href="#">#71</a></p> <p>The PDF document (AMC1_ACS_TFcomments.pdf) attached here contains <b>all ACS</b> objectives where the modified parts are presented in the colour coded track changes format. It is provided to help readers/reviewers in noticing and comparing the proposed changes in the context of all other objectives within the same subtopic/topic or subject. The other documents that are attached to the following comments in the respective segments (subjects) repeat only the modified parts in the same colour coded format.</p>
response	<p><i>Partially accepted</i></p> <p>The following modifications to the proposed content are introduced:</p> <p>Subtopics under topic 'LAW 3 - ATC safety management' are to be named 'LAW 3.1 - Feedback process' and 'LAW 3.2 - Safety investigation'.</p> <p>The essential requirement in Article 4(c)(i) of Annex Vb to the Basic Regulation requires air traffic controllers to be trained in and qualified for abnormal and emergency situations. This is the reason why the term 'abnormal' is used in the subject implementing rule. As regards the original proposal, the Agency considered to be explicit that the rather wide definition proposed for 'abnormal situation' (= circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills) does include unusual and degraded situations as well. The examples placed into the definition itself provided an even more detailed description of abnormal situations, amongst which degraded situations are covered with an example in subparagraph (c).</p> <p>With the view to clarify further, that the definition for abnormal situation includes unusual and degraded situations, and at the same time maintain consistency with the terminology used in the Basic Regulation, the Agency proposes to expand the definition as follows:</p> <p>'abnormal situation' means circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills, including degraded situations.</p> <p>At the same time and following the comments, the examples are placed into AMC material. The training material is also reviewed to ensure the use of consistent terminology.</p>

comment	<p>84 ❖ <span style="float: right;">comment by: ENAC-FRANCE</span></p> <p><u>Comment:</u></p> <p>If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u></p> <p>Transfer subject objectives, topics and sub topic from the IR to the AMC.</p> <p>Add to the AMC each subject objective.</p>
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response

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 – Initial training requirements for Air Traffic Controllers – AMC1 to Appendix 9 – Area Control Surveillance Rating (ACS) – Subject 1: INTRODUCTION TO THE COURSE**

p. 260

comment	72	comment by: ACCCT TF
	Attachment <a href="#">#72</a>	
	ACCCT TF comments are attached	
response	<i>Accepted</i>	

comment	84 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u>          If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u>          Transfer subject objectives, topics and sub topic from the IR to the AMC.          Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u>          B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training</b>.          C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u>          Add:          The subject objective is:          Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u>          The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>	
response	<p><i>Partially accepted</i></p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>— Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>— Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core</li> </ul>	

Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

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**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 9 — Area Control Surveillance Rating (ACS) — Subject 2: AVIATION LAW**

p. 261

comment 73 comment by: ACCCT TF

Attachment [#73](#)

ACCCT TF comments are attached

response *Partially accepted*

Subtopics under topic 'LAW 3 - ATC safety management' are to be named 'LAW 3.1 - Feedback process' and 'LAW 3.2 - Safety investigation'.

comment 84 ❖ comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 — Basic training**.

response

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

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**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 —  
Initial training requirements for Air Traffic Controllers — AMC1 to  
Appendix 9 — Area Control Surveillance Rating (ACS) — Subject 3: AIR  
TRAFFIC MANAGEMENT**

p. 262-269

comment 74

comment by: ACCCT TF

response	<p>Attachment <a href="#">#74</a></p> <p>ACCCT TF comments are attached</p> <p>Accepted</p>
comment	<p>84 ❖ <span style="float: right;">comment by: ENAC-FRANCE</span></p> <p><u>Comment:</u> If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u> Transfer subject objectives, topics and sub topic from the IR to the AMC. Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u> B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training</b>. C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p> <p><u>Example for BASIC Subject1</u> Add: The subject objective is: Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u> The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>
response	<p>Partially accepted</p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>– Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>– Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.</li> </ul> <p>The results of the review and update of the ATCO Common Core Content for</p>

Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

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**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 9 — Area Control Surveillance Rating (ACS) — Subject 4: METEOROLOGY**

p. 270

comment

75

comment by: ACCCT TF

Attachment [#75](#)

ACCCT TF comments are attached

response

Accepted

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 — Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will



response

follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 9 — Area Control Surveillance Rating (ACS) — Subject 5: NAVIGATION**

p. 271

comment

76

comment by: ACCCT TF

Attachment [#76](#)

ACCCT TF comments are attached

response

*Accepted*

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training

requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 —  
Initial training requirements for Air Traffic Controllers — AMC1 to  
Appendix 9 — Area Control Surveillance Rating (ACS) — Subject 6:  
AIRCRAFT**

p. 272-273

comment

77

comment by: ACCCT TF

Attachment [#77](#)

ACCCT TF comments are attached

response

Accepted

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.  
Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 — Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response

Partially accepted

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

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**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 —  
Initial training requirements for Air Traffic Controllers — AMC1 to  
Appendix 9 — Area Control Surveillance Rating (ACS) — Subject 7:  
HUMAN FACTORS**

p. 274-277

comment	78	comment by: ACCCT TF
	Attachment <a href="#">#78</a>	
	ACCCT TF comments are attached	
response	Accepted	

comment	84 ❖	comment by: ENAC-FRANCE
	<u>Comment:</u> If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training	

are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
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The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

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**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 —  
Initial training requirements for Air Traffic Controllers — AMC1 to  
Appendix 9 — Area Control Surveillance Rating (ACS) — Subject 8:  
EQUIPMENT AND SYSTEMS**

p. 278-280

comment

79

comment by: ACCCT TF

Attachment [#79](#)

ACCCT TF comments are attached

response

*Accepted*

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topic from the IR to the AMC.

Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 — Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

response

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a

change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 — Initial training requirements for Air Traffic Controllers — AMC1 to Appendix 9 — Area Control Surveillance Rating (ACS) — Subject 9: PROFESSIONAL ENVIRONMENT**

p. 281

comment

80

comment by: ACCCT TF

Attachment [#80](#)

ACCCT TF comments are attached

response

Accepted

comment

84 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

response

Transfer subject objectives, topics and sub topic from the IR to the AMC.  
Add to the AMC each subject objective.

Example for BASIC

B. Basic training should contain the following training objectives that are associated with the subjects, ~~subject objectives, topics and subtopics~~ contained in **Appendix 3 – Basic training**.

C. Subjects, ~~topics and subtopics~~ from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.

Example for BASIC Subject1

Add:

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.

Training objectives:

The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.

*Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.

All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.

**ANNEX 1 – PART-ATCO, SUBPART D – ATCO TRAINING, Section 2 –  
Initial training requirements for Air Traffic Controllers – AMC1 to  
Appendix 9 – Area Control Surveillance Rating (ACS) – Subject 10:  
UNUSUAL/DEGRADED/EMERGENCY SITUATIONS**

p. 282-283



comment	<p>81</p> <p>comment by: ACCCT TF</p> <p>Attachment <a href="#">#81</a></p> <p>ACCCT TF comments are attached</p>
response	<p><i>Partially accepted</i></p> <p>The essential requirement in Article 4(c)(i) of Annex Vb to the Basic Regulation requires air traffic controllers to be trained in and qualified for abnormal and emergency situations. This is the reason why the term 'abnormal' is used in the subject implementing rule. As regards the original proposal, the Agency considered to be explicit that the rather wide definition proposed for 'abnormal situation' (= circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills) does include unusual and degraded situations as well. The examples placed into the definition itself provided an even more detailed description of abnormal situations, amongst which degraded situations are covered with an example in subparagraph (c).</p> <p>With the view to clarify further, that the definition for abnormal situation includes unusual and degraded situations, and at the same time maintain consistency with the terminology used in the Basic Regulation, the Agency proposes to expand the definition as follows:</p> <p>'abnormal situation' means circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills, including degraded situations.</p> <p>At the same time and following the comments, the examples are placed into AMC material. The training material is also reviewed to ensure the use of consistent terminology.</p>
comment	<p>84 ❖</p> <p>comment by: ENAC-FRANCE</p> <p><u>Comment:</u></p> <p>If the minimum requirements for the training of the ATCO as stated in Eurocontrol's specification for the ATCO Common Core Content Initial Training are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u></p> <p>Transfer subject objectives, topics and sub topic from the IR to the AMC. Add to the AMC each subject objective.</p> <p><u>Example for BASIC</u></p> <p>B. Basic training should contain the following training objectives that are associated with the subjects, <del>subject objectives, topics and subtopics</del> contained in <b>Appendix 3 – Basic training</b>.</p> <p>C. Subjects, <del>topics and subtopics</del> from the Appendix are repeated in this AMC for the convenience of the reader and do not form part of it.</p>

	<p><u>Example for BASIC Subject1</u></p> <p>Add:</p> <p>The subject objective is:</p> <p>Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.</p> <p><u>Training objectives:</u></p> <p>The work of Eurocontrol ACCCTF (completed in 2012) should be integrated and updated with the analysis of comments made on the NPA.</p>
response	<p><i>Partially accepted</i></p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> <li>— Subjects, topics and subtopics are transposed into Implementing Rules;</li> <li>— Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.</li> </ul> <p>The results of the review and update of the ATCO Common Core Content for Initial Training performed by EUROCONTROL and its ATCO Common Core Content Training Task Force during 2012 on request of the Agency have been placed as comments to B.III and B.V of the NPA. The methodology adopted to place these comments and to explain how the modifications are proposed is explained in comment #28 to B.III and in comment #1 to B.V.</p> <p>All EUROCONTROL ACCCT Task Force's comments are visible to the public and are shared with stakeholders through this CRD. The Agency takes into account these proposed changes when establishing the content of the Initial Training requirements to be proposed with the Opinion and with the successive Agency Decision.</p>

**ANNEX 1 — PART-ATCO, SUBPART D — ATCO TRAINING, Section 2 —  
Initial training requirements for Air Traffic Controllers — AMC1 to  
Appendix 9 — Area Control Surveillance Rating (ACS) — Supplements**

p. 284-299

comment

85 ❖

comment by: ENAC-FRANCE

3. Common objectives.

Comment:

In the present Eurocontrol Common Core Content Document, the repeated and common objectives are referred to with separate titles.

In the AMC, repeated objectives should be identified clearly.

Proposal:

3. ~~Repeated and~~ common objectives

a. ~~Repeated and~~ common objectives are only applicable to Rating Training syllabi.

b. ~~Repeated objectives~~

c. ~~Common objectives~~

**Action verbs:**

General comment:

Some verbs are listed in NPA tables but not used in the objectives content. Therefore, they should not figure in the tables and be deleted.

f. Action verbs for Level 5:

Comment:

Assess, discuss, resolve, theorise and validate are not used in the rating objectives in the NPA. They should be deleted.

Proposal: delete these verbs

L5 verb	Definition	Example
Assess	<del>Estimate value or difficulty, evaluate, appraise</del>	<del>Assess workload</del>
Balance	Weigh (a question, two arguments, etc., against each other)	Balance the workload with the traffic demand.
Discuss	<del>Investigate by reasoning or argument</del>	<del>Discuss the impact of regulation.</del>
Evaluate	Ascertain amount of, find numerical expression for	Evaluate the necessary information to be provided to pilots in need of navigational assistance.
Interpret	To decide on something's meaning or significance when there is a choice	Interpret operational information.
Resolve	<del>Solve, clear up, settle</del>	<del>Resolve conflict</del>
Select	Pick out as best or most suitable	Select the runway in use
Theorise	<del>Extract general principles from a particular experience</del>	<del>Theorise the resolution of conflict between a slow and a fast aircraft</del>
Validate	<del>Make valid, ratify, prove valid, show or confirm the validity of something</del>	<del>Validate one radar vectoring option to expedite the traffic</del>

response *Partially accepted*

The Agency has decided to reintroduce the indication of repeated and common objectives, according to the convention established in the EUROCONTROL Specification for ATCO CCC Initial Training.

The Agency considers that the list of action verbs is adequate. Some verbs are

not used with the existing objectives, but they could be useful to training organisations when developing additional objectives.

## 2. Resulting text

For the resulting text please refer to **Annex B.V(b)** published at <http://easa.europa.eu/rulemaking/comment-response-documents-CRDs-and-review-groups.php>.

### 3. Appendix A — Attachments

 [EASA NPA 2012-18 FABEC comment ATCO Initial Training.pdf](#)

Attachment #1 to comment [#87](#)

 [AMC1 Basic TFcomments.pdf](#)

Attachment #2 to comment [#11](#)

 [AMC1 INTRB TFcommentsOnly.pdf](#)

Attachment #3 to comment [#2](#)

 [AMC1 LAWB TFcommentsOnly.pdf](#)

Attachment #4 to comment [#3](#)

 [AMC1 ATMB TFcommentsOnly.pdf](#)

Attachment #5 to comment [#4](#)

 [AMC1 METB TFcommentsOnly.pdf](#)

Attachment #6 to comment [#5](#)

 [AMC1 NAVB TFcommentsOnly.pdf](#)

Attachment #7 to comment [#6](#)

 [AMC1 ACFTB TFcommentsOnly.pdf](#)

Attachment #8 to comment [#7](#)

 [AMC1 HUMB TFcommentsOnly.pdf](#)

Attachment #9 to comment [#8](#)

 [AMC1\\_EQPSB\\_TFcommentsOnly.pdf](#)

Attachment #10 to comment [#9](#)

 [AMC1\\_PENB\\_TFcommentsOnly.pdf](#)

Attachment #11 to comment [#10](#)

 [AMC1\\_ADV\\_TFcomments.pdf](#)

Attachment #12 to comment [#12](#)

 [AMC1\\_toApp4ADV\\_INTR\\_TFcommentsOnly.pdf](#)

Attachment #13 to comment [#13](#)

 [AMC1\\_toApp4ADV\\_LAW\\_TFcommentsOnly.pdf](#)

Attachment #14 to comment [#14](#)

 [AMC1\\_toApp4ADV\\_ATM\\_TFcommentsOnly.pdf](#)

Attachment #15 to comment [#15](#)

 [AMC1\\_toApp4ADV\\_MET\\_TFcommentsOnly.pdf](#)

Attachment #16 to comment [#16](#)

 [AMC1\\_toApp4ADV\\_NAV\\_TFcommentsOnly.pdf](#)

Attachment #17 to comment [#17](#)

 [AMC1\\_toApp4ADV\\_ACFT\\_TFcommentsOnly.pdf](#)

Attachment #18 to comment [#18](#)

 [AMC1\\_toApp4ADV\\_HUM\\_TFcommentsOnly.pdf](#)

Attachment #19 to comment [#19](#)

 [AMC1\\_toApp4ADV\\_EQPS\\_TFcommentsOnly.pdf](#)

Attachment #20 to comment [#20](#)

 [AMC1\\_toApp4ADV\\_PEN\\_TFcommentsOnly.pdf](#)

Attachment #21 to comment [#21](#)

 [AMC1\\_toApp4ADV\\_UDES\\_TFcommentsOnly.pdf](#)

Attachment #22 to comment [#22](#)

 [AMC1\\_toApp4ADV\\_AGA\\_TFcommentsOnly.pdf](#)

Attachment #23 to comment [#23](#)

 [AMC1\\_ADI\\_TFcomments.pdf](#)

Attachment #24 to comment [#24](#)

 [AMC1\\_toApp5\\_ADI\\_INTR\\_TFcommentsOnly.pdf](#)

Attachment #25 to comment [#25](#)

 [AMC1\\_toApp5\\_ADI\\_LAW\\_TFcommentsOnly.pdf](#)

Attachment #26 to comment [#26](#)

 [AMC1\\_toApp5\\_ADI\\_ATM\\_TFcommentsOnly.pdf](#)

Attachment #27 to comment [#27](#)



 [AMC1\\_toApp5\\_ADI\\_MET\\_TFcommentsOnly.pdf](#)

Attachment #28 to comment [#28](#)

 [AMC1\\_toApp5\\_ADI\\_NAV\\_TFcommentsOnly.pdf](#)

Attachment #29 to comment [#29](#)

 [AMC1\\_toApp5\\_ADI\\_ACFT\\_TFcommentsOnly.pdf](#)

Attachment #30 to comment [#30](#)

 [AMC1\\_toApp5\\_ADI\\_HUM\\_TFcommentsOnly.pdf](#)

Attachment #31 to comment [#31](#)

 [AMC1\\_toApp5\\_ADI\\_EQPS\\_TFcommentsOnly.pdf](#)

Attachment #32 to comment [#32](#)

 [AMC1\\_toApp5\\_ADI\\_PEN\\_TFcommentsOnly.pdf](#)

Attachment #33 to comment [#33](#)

 [AMC1\\_toApp5\\_ADI\\_UDES\\_TFcommentsOnly.pdf](#)

Attachment #34 to comment [#34](#)

 [AMC1\\_toApp5\\_ADI\\_AGA\\_TFcommentsOnly.pdf](#)

Attachment #35 to comment [#35](#)

 [AMC1\\_APP\\_TFcomments.pdf](#)

Attachment #36 to comment [#36](#)

 [AMC1\\_toApp6\\_APP\\_INTR\\_TFcommentsOnly.pdf](#)

Attachment #37 to comment [#37](#)

 [AMC1 toApp6 APP LAW TFcommentsOnly.pdf](#)

Attachment #38 to comment [#38](#)

 [AMC1 toApp6 APP ATM TFcommentsOnly.pdf](#)

Attachment #39 to comment [#39](#)

 [AMC1 toApp6 APP MET TFcommentsOnly.pdf](#)

Attachment #40 to comment [#40](#)

 [AMC1 toApp6 APP NAV TFcommentsOnly.pdf](#)

Attachment #41 to comment [#41](#)

 [AMC1 toApp6 APP ACFT TFcommentsOnly.pdf](#)

Attachment #42 to comment [#42](#)

 [AMC1 toApp6 APP HUM TFcommentsOnly.pdf](#)

Attachment #43 to comment [#43](#)

 [AMC1 toApp6 APP EQPS TFcommentsOnly.pdf](#)

Attachment #44 to comment [#44](#)

 [AMC1 toApp6 APP PEN TFcommentsOnly.pdf](#)

Attachment #45 to comment [#45](#)

 [AMC1 toApp6 APP UDES TFcommentsOnly.pdf](#)

Attachment #46 to comment [#46](#)

 [AMC1 toApp6 APP AGA TFcommentsOnly.pdf](#)

Attachment #47 to comment [#47](#)

 [AMC1 ACP TFcomments.pdf](#)

Attachment #48 to comment [#48](#)

 [AMC1 toApp7 ACP INTR TFcommentsOnly.pdf](#)

Attachment #49 to comment [#49](#)

 [AMC1 toApp7 ACP LAW TFcommentsOnly.pdf](#)

Attachment #50 to comment [#50](#)

 [AMC1 toApp7 ACP ATM TFcommentsOnly.pdf](#)

Attachment #51 to comment [#51](#)

 [AMC1 toApp7 ACP MET TFcommentsOnly.pdf](#)

Attachment #52 to comment [#52](#)

 [AMC1 toApp7 ACP NAV TFcommentsOnly.pdf](#)

Attachment #53 to comment [#53](#)

 [AMC1 toApp7 ACP ACFT TFcommentsOnly.pdf](#)

Attachment #54 to comment [#54](#)

 [AMC1 toApp7 ACP HUM TFcommentsOnly.pdf](#)

Attachment #55 to comment [#55](#)

 [\\_AMC1\\_toApp7\\_ACP\\_EQPS\\_TFcommentsOnly.pdf](#)

Attachment #56 to comment [#56](#)

 [\\_AMC1\\_toApp7\\_ACP\\_PEN\\_TFcommentsOnly.pdf](#)

Attachment #57 to comment [#57](#)

 [\\_AMC1\\_toApp7\\_ACP\\_UDES\\_TFcommentsOnly.pdf](#)

Attachment #58 to comment [#58](#)

 [\\_AMC1\\_APS\\_TFcomments.pdf](#)

Attachment #59 to comment [#59](#)

 [\\_AMC1\\_toApp8\\_APS\\_INTR\\_TFcommentsOnly.pdf](#)

Attachment #60 to comment [#60](#)

 [\\_AMC1\\_toApp8\\_APS\\_LAW\\_TFcommentsOnly.pdf](#)

Attachment #61 to comment [#61](#)

 [\\_AMC1\\_toApp8\\_APS\\_ATM\\_TFcommentsOnly.pdf](#)

Attachment #62 to comment [#62](#)

 [\\_AMC1\\_toApp8\\_APS\\_MET\\_TFcommentsOnly.pdf](#)

Attachment #63 to comment [#63](#)

 [\\_AMC1\\_toApp8\\_APS\\_NAV\\_TFcommentsOnly.pdf](#)

Attachment #64 to comment [#64](#)

 [\\_AMC1\\_toApp8\\_APS\\_ACFT\\_TFcommentsOnly.pdf](#)

Attachment #65 to comment [#65](#)

 [AMC1 toApp8 APS HUM TFcommentsOnly.pdf](#)

Attachment #66 to comment [#66](#)

 [AMC1 toApp8 APS EQPS TFcommentsOnly.pdf](#)

Attachment #67 to comment [#67](#)

 [AMC1 toApp8 APS PEN TFcommentsOnly.pdf](#)

Attachment #68 to comment [#68](#)

 [AMC1 toApp8 APS UDES TFcommentsOnly.pdf](#)

Attachment #69 to comment [#69](#)

 [AMC1 toApp8 APS AGA TFcommentsOnly.pdf](#)

Attachment #70 to comment [#70](#)

 [AMC1 ACS TFcomments.pdf](#)

Attachment #71 to comment [#71](#)

 [AMC1 toApp9 ACS INTR TFcommentsOnly.pdf](#)

Attachment #72 to comment [#72](#)

 [AMC1 toApp9 ACS LAW TFcommentsOnly.pdf](#)

Attachment #73 to comment [#73](#)

 [AMC1 toApp9 ACS ATM TFcommentsOnly.pdf](#)

Attachment #74 to comment [#74](#)

 [AMC1 toApp9 ACS MET TFcommentsOnly.pdf](#)

Attachment #75 to comment [#75](#)

 [AMC1 toApp9 ACS NAV TFcommentsOnly.pdf](#)

Attachment #76 to comment [#76](#)

 [AMC1 toApp9 ACS ACFT TFcommentsOnly.pdf](#)

Attachment #77 to comment [#77](#)

 [AMC1 toApp9 ACS HUM TFcommentsOnly.pdf](#)

Attachment #78 to comment [#78](#)

 [AMC1 toApp9 ACS EQPS TFcommentsOnly.pdf](#)

Attachment #79 to comment [#79](#)

 [AMC1 toApp9 ACS PEN TFcommentsOnly.pdf](#)

Attachment #80 to comment [#80](#)

 [AMC1 toApp9 ACS UDES TFcommentsOnly.pdf](#)

Attachment #81 to comment [#81](#)